

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

2019 JUN 21 PM 12:42

DEPUTY CLERK 

UNITED STATES OF AMERICA

Plaintiff,

v.

NO. 3:19-MC - 47

\$64,000.00 IN U.S. CURRENCY, ET AL.,

Defendant in rem.

**JOINT MOTION TO EXTEND
TIME TO FILE JUDICIAL FORFEITURE ACTION**

The United States of America and Claimants Ricardo Ramos and Vincent Escobar, through their attorney of record, J. Michael Price II, jointly move, pursuant to 18 U.S.C. § 983(a)(3)(A), for a 45-day extension of time to file a judicial action regarding property to which Ramos and Escobar have filed a claim in an administrative forfeiture proceeding with the U.S. Customs and Border Protection (CBP), and in support state:

1. CBP seized \$64,000.00 and \$10,000.00 in U.S. Currency on or about January 27, 2019, at DFW International Airport in Tarrant County, Texas.
2. CBP sent written notice of intent to forfeit the seized property to all potentially interested parties as required by 18 U.S.C. § 983(a)(1)(A). On March 21, 2019, Ramos, through his attorney of record, J. Michael Price II filed a claim to \$64,000.00 with CBP. Moreover, Escobar, through his attorney J. Michael Price II filed a claim to \$10,000.00 in U.S. Currency with CBP.

3. No other person(s) has filed a claim to the property, and the time to do so under 18 U.S.C. § 983(a)(2)(A)-(E) has expired.

4. According to 18 U.S.C. § 983(a)(3)(A)-(C), the United States is to file a judicial forfeiture action no later than 90 days after a claim has been filed or return the seized property pending such filing, except that a court may extend the filing period for good cause shown or upon agreement of the parties.

5. Unless the court extends the judicial filing deadline for good cause or upon agreement of the parties, the 90-day period that began with Ramos's claim expires on June 24, 2019. Furthermore, the 90-day period that began with Escobar's claim expires on July 16, 2019.

6. The parties have agree to extend the time for filing a judicial action for 45 days, to and including August 8, 2019 for Ramos and August 30, 2019 for Escobar.

CONCLUSION


Therefore, the parties request an order to extend the filing period for a judicial forfeiture action to and including August 8, 2019 for Ramos and August 30, 2019 for Escobar.

Respectfully submitted,

ERIN NEALY COX
UNITED STATES ATTORNEY


/s/ Mark J. Tindall

MARK J. TINDALL
Assistant United States Attorney
Texas State Bar No. 24071364
1100 Commerce Street, Third Floor
Dallas, TX 75242-1699
Telephone: 214-659-8600
Facsimile: 214-659-8803
E-mail: mark.tindall@usdoj.gov


J. MICHAEL PRICE II
Attorney for Claimants

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NO. 3:19-MC- 47

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Defendant in rem.

**ORDER EXTENDING TIME
TO FILE JUDICIAL FORFEITURE ACTION**

Before the court is the parties' joint motion to extend the time to file a judicial forfeiture action \$64,000.00 and \$10,000.00 in U.S. Currency seized from claimants Ricardo Ramos and Vincent Escobar, on or about January 27, 2019 at DFW International Airport in Tarrant County, Texas. The United States, Ramos, and Escobar have agreed to extend the current deadlines of June 24, 2019 and July 16, 2019. No other parties made a claim to the property during the administrative forfeiture proceeding.

The court being authorized by 18 U.S.C. § 983(a)(3)(A) to extend the time in which the United States is required to file a complaint for forfeiture against the property or obtain an indictment alleging that the property is subject to forfeiture based upon agreement of the parties; it is

ORDERED, pursuant to 18 U.S.C. § 983(A)-(C), that the date by which the United States is required to file a complaint for forfeiture against the property and/or to obtain an indictment alleging that the property is subject to forfeiture is extended to August 8, 2019 for Ramos and August 30, 2019 for Escobar.

KAREN GREN SCHOLER
UNITED STATES JUDGE